

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA,

Plaintiff,

v.

CARLOS A. ACOSTA;  
ANGELA P. ACOSTA; and  
REPAINTEX COMPANY,

Defendants.

Civil Action No. 1:24-cv-01876

**DECLARATION OF TIMOTHY SNYDER IN SUPPORT OF PLAINTIFF TRAVELERS  
CASUALTY AND SURETY COMPANY OF AMERICA'S MOTION  
FOR ENTRY OF DEFAULT AGAINST DEFENDANT REPAINTEX COMPANY**

I, Timothy G. Snyder, hereby declare as follows:

1. I am over the age of 18 and if called to testify, I am competent to testify as to the matters set forth herein.

2. I am employed by Travelers Casualty and Surety Company of America ("Travelers") as Senior Bond Claim Executive – Recovery Management Unit. I have worked at Travelers since 1995. Travelers is in the business of, among other things, issuing surety bonds on behalf of various entities throughout the United States. In my role, part of my responsibilities include investigating and responding to claims asserted against surety bonds issued by Travelers as well as enforcing the terms of related indemnity agreements. I have been assigned to handle and am familiar with the facts and circumstances surrounding the above-captioned matter; accordingly, I hereby state and declare the following based on my personal knowledge.

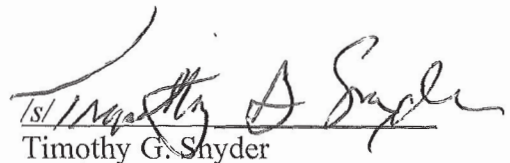
3. I have personal knowledge that Travelers initiated these proceedings on October 25, 2024, by filing its Complaint against Repaintex Company ("Repaintex"), Carlos A. Acosta

(“Mr. Acosta”), and Angela P. Acosta (“Ms. Acosta,” and collectively, the “Defendants”) seeking money damages, specific performance, and injunctive relief based upon Defendants’ breaches of the General Agreement of Indemnity (“Indemnity Agreement”), executed by each of the Defendants in favor of Travelers, for losses sustained by Travelers in connection with surety payment and performance bonds (“Bonds”) that it issued on behalf of, and at the request of, Defendants in connection with a series of construction projects.

4. I also have personal knowledge that, as of the filing of Travelers’ Motion for Entry of Default, Travelers has realized and paid losses on Bonds issued on behalf of the Defendants and has incurred fees and expenses recoverable under the Indemnity Agreement in the aggregate amount of \$4,647,666.75 in loss payments plus \$211,216.29 in professional fees recoverable under the Indemnity Agreement. The current aggregate for the Reserves set on open exposure totals \$3,106,837.96. The total aggregate amount Travelers is seeking is \$7,965,721.00.

I declare under penalty of perjury that the foregoing factual statements are true and correct to the best of my personal knowledge and belief.

Executed on March 20, 2025 in Hunt Valley, Maryland.

  
/s/ Timothy G. Snyder  
Timothy G. Snyder